

AFFIDAVIT OF NESSA G. SIEGEL

STATE OF OHIO)
)
COUNTY OF CUYAHOGA) SS. A F F I D A V I T

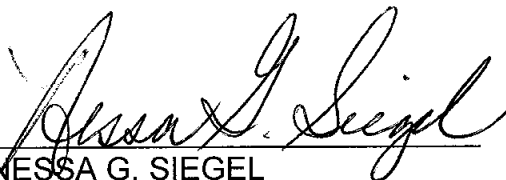
NOW COMES NESSA G. SIEGEL, being first duly sworn according to law,
deposes and states as follows:

1. I am an attorney practicing law in Cleveland, Ohio since November, 1986;
2. I am an attorney licensed to practice before the Ohio Supreme Court and the United States District Court for the Northern District, Ohio Eastern Division, and the United States Court of Appeals for the Sixth Circuit;
3. I am a practicing attorney who concentrates on matters involving the education of the disabled, including matters under the Individuals with Disabilities Education Act.
4. Approximately 90% of my practice is devoted to obtaining special education services for children with disabilities;
5. I am familiar with fees charged by attorneys in this community for the representation of litigants in claims arising under the IDEA. I am also familiar with fees charged by attorneys in similar federal court claims, such as claims involving civil rights and employment discrimination;
6. I have litigated on behalf of special education students at Due Process Hearings, in Federal District and in the Sixth Circuit;
7. I, along with my associates, spend at minimum 250 hours at the Due Process level, preparing for Hearing, including, but not limited to, preparing testimony and witnesses, (anywhere from 10 to 15 witnesses) drafting and responding to motions and writing pre-trial and post hearing

briefs.

8. I charge \$250.00 per hour for my legal services in special education matters; I believe the fee of \$225.00 per hour charged by Phyllis Brown is more than reasonable for the outcome obtained in this matter.

AFFIANT FURTHER SAYETH NAUGHT.


NESSA G. SIEGEL

SWORN TO BEFORE ME, and subscribed in my presence this 12th day of March, 2004.


NOTARY PUBLIC

BARBARA KAYE BEISER, Attorney At Law
Notary Public - State of Ohio
My commission has no expiration date.
Section 147.03 B, C.